

HONORABLE BRIAN D. LYNCH

HEARING DATE: FRIDAY, JANUARY 25, 2013
HEARING TIME: 11:30 A.M.
LOCATION: COURTROOM I, TACOMA
RESPONSE DUE: TIME OF HEARING

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

MERIDIAN SUNRISE VILLAGE, LLC,

Debtor.

No. 13-40342

NOTICE OF HEARING ON DEBTOR'S
EMERGENCY MOTIONS:

EMERGENCY MOTION RE: INTERIM
USE OF CASH COLLATERAL

EMERGENCY MOTION RE: CASH
MANAGEMENT, BANK ACCOUNTS
AND GIFT CARDS

EMERGENCY MOTION RE:
BANKRUPTCY CODE § 366 (INTERIM)

TO: THE CLERK OF THE COURT
AND TO: THE HONORABLE
AND TO: ALL PARTIES-IN-INTEREST
HEARING DATE: FRIDAY, JANUARY 25, 2013
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LOCATION: UNITED STATES BANKRUPTCY COURT, COURTROOM I, U.S.
COURTHOUSE, 1717 PACIFIC AVENUE, TACOMA WA 98402

PLEASE TAKE NOTICE that Meridian Sunrise Village, LLC ("Debtor"), debtor-in-possession herein, has filed the following motions with the Court ("Emergency Motions"):

NOTICE OF HEARING ON DEBTOR'S EMERGENCY
MOTIONS: – Page 1

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LAW OFFICES

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1 1. Emergency Motion for Order Authorizing Use of Cash Collateral, Granting of
2 Adequate Protection, and Setting Final Hearing. In this motion, the Debtor seeks interim authority to
3 (i) use cash collateral, in the form of rents collected from tenants of its shopping center, to pay
4 reasonable and necessary operating expenses; and (ii) grant, on an interim basis, adequate protection
5 of the interests of the lender group secured in such rents on account of the Debtor's use of such rents.

6 2. Emergency Motion for Order Authorizing Debtor to Continue Using Prepetition Bank
7 Accounts and Checks. The Debtor seeks authority to continue using its prepetition bank accounts in
8 the same manner as it used them prepetition and to continue to use its pre-petition checks without the
9 need to note "debtor-in-possession" on each check.

10 3. Emergency Motion for Order Approving Proposed Adequate Assurance Under
11 Bankruptcy Code § 366 on an Interim Basis. The Debtor seeks approval on an interim basis of its
12 proposed adequate assurance to utilities in the form of a deposit equal to the two-week average of its
13 usage. Utilities will have an opportunity to respond prior to the approval becoming final.

14 The motion is on file with the above-captioned Court, together with supporting documents.
15 Any party desiring information as to the details may request same from the Clerk of the Court or from
16 the undersigned counsel.

17 IF YOU OPPOSE the motion, you must file your written response with the court clerk and
18 serve it upon the undersigned counsel NOT LATER THAN THE RESPONSE DATE, which is the
19 date of the hearing.

20 IF NO RESPONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion,
21 GRANT THE MOTION PRIOR TO THE HEARING, WITHOUT FURTHER NOTICE, and strike
22 the hearing.

23 DATED this 22nd day of January, 2013.

BUSH STROUT & KORNFELD LLP

By /s/ James L. Day
James L. Day, WSBA #20474
Christine M. Tobin-Presser, WSBA #27628
Attorneys for Meridian Sunrise Village, LLC